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April 29, 2022

VIA ECF

Hon. Lorna G. Schofield
United States District Court, S.D.N.Y.
40 Centre Street
Courtroom 1106
New York, New York 10007

Application GRANTED. The initial pretrial conference scheduled for May 4, 2022, is ADJOURNED to June 15, 2022, at 4:00 P.M. Plaintiff shall move for default judgment and file the default judgment papers by May 17, 2022.

Dated: May 2, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

RE: Anne Valdez, et al v. The United States of America; 22-CV-1783 (LGS)

Dear Judge Schofield:

We represent Plaintiffs in the above-referenced action. In accord with your Order dated April 28, 2022, we write to request an adjournment of the initial pretrial conference scheduled for May 4, 2022. As your order anticipated, we have not heard from Defendant's counsel. We do not even know who Defendant's counsel is.

We would like to request a bit more than a thirty day adjournment. I will be overseas on unrelated business from May 17th through June 8th and I expect that I will be unable to easily connect to a teleconference during that time. I propose an adjourned conference date anytime during the week of June 13th—excluding June 14th. I also propose May 17, 2022 as the date by which we would file an Order to Show Cause for a default judgment against Defendant, with a request that the return date also be set for June 13th or later.

Respectfully,


Charles Caranicas

cc: United States of America (via USPS, First Class Mail—
to both the New York City and Washington D.C. addresses)